

December 11, 2018

The Honorable Ajit Pai, Chairman
The Honorable Michael O'Rielly, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Jessica Rosenworcel, Commissioner
Federal Communications Commission
455 12th Street, Southwest
Washington, DC, 20544

RE: MB Docket No 05-311 In the Matter of Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as Amended by the Cable Television Consumer Protection and Competition Act of 1992

We are writing in support of the Comments of the Cable Act Preservation Alliance ("CAPA") in the Second Further Notice of Proposed Rule Making. We oppose the tentative conclusions the FCC reaches in the proceeding because of their impacts on our community.

Valley Media Works is an independent, nonprofit public, education, and government access center in Eau Claire, WI. We have served this community since March 15, 1978 and have grown from airing just a few hours of local content on one channel per week to running two channels 24/7 along with an LPFM radio station. The content on our channels is comprised of local government meetings (including, but not limited to, Eau Claire City Council, Eau Claire County Board, and Eau Claire Area School District Board), instructional and informative series covering a wide range of topics from crafts to health, community-based entertainment such as musical performances, and sermons from several area congregations. It is rare that these items make it onto the television screens of our viewers from other sources, and when they do it is only in (substantially edited) part. Our broadcasts reach thousands of homes and provide a sense of connectedness in our neighborhoods to individuals who may be house-bound due to age, illness, or disability. Further, our audience extends beyond Eau Claire, Chippewa, and Dunn counties (over 212,000 people) and encompasses all socioeconomic and educational backgrounds, ethnicities and religions, political affiliations and professions.

However, we are more than just broadcast! Valley Media Works provides educational opportunities in broadcast and video production that are not available elsewhere to our neighbors. Our staff has conducted classes for everyone from elementary age students to senior citizens, for individuals and groups like Girl Scouts of America, Boys & Girls Club, and church

youth groups. Students at area high schools, Chippewa Valley Technical College, and the University of Wisconsin-Eau Claire and Stout may participate in job shadowing, community service/volunteering, and internships designed to provide them with professional experience in broadcast engineering, journalism, graphic and web design, nonprofit management, marketing, communications, event planning, and videography.

Our presence encourages viewers in our community to watch cable television as was intended by the 1984 Cable Act – by enhancing local voices, serving local viewers and strengthening our local democracy. By defining "in-kind" support in an overly broad fashion, the rule making will shift the fair balance between local and state authorities and cable operators and will force communities to choose between franchise fees and PEG channels which was never the intent of the Act. By allowing cable operators to reduce franchise fee support for local communities if they opt for local channels, the FNPRM jeopardizes the ability of PEG channels to serve communities such as ours. We ask that it not be adopted. Thank you.

Yours sincerely,

Jerry Barton, Executive Director







